



SACHI A. HAMAI
Chief Executive Officer

County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

Board of Supervisors
HILDA L. SOLIS
First District

MARK RIDLEY-THOMAS
Second District

SHEILA KUEHL
Third District

JANICE HAHN
Fourth District

KATHRYN BARGER
Fifth District

December 7, 2016

To: Supervisor Mark Ridley-Thomas, Chairman
Supervisor Hilda L. Solis
Supervisor Sheila Kuehl
Supervisor Janice Hahn
Supervisor Kathryn Barger

From: Sachi A. Hamai
Chief Executive Officer

REPORT ON LEVERAGING COUNTY ASSETS TO COMBAT HOMELESSNESS (ITEM NO. 16, AGENDA OF AUGUST 16, 2016)

Background

On August 16, 2016, the Board of Supervisors (Board) adopted a Motion (Motion) by Mark Ridley-Thomas, Chairman, instructing the Chief Executive Officer (CEO), in coordination with County Counsel, the Director of Regional Planning and outside media experts, to report back to the Board in 60 days with an inventory of County-owned properties and vehicles that could be leveraged for advertising media to generate funds to address homelessness.

Further, the Board requested the projected media revenue from each property, the annual costs to manage the program, and any zoning or building code issues affecting the marketing and advertising opportunities. The Board asked for guidelines to prevent objectionable advertisements, and a process, budget and timeline to implement and manage this effort, including the process for permitting in the unincorporated area of the County and within the jurisdiction of an incorporated city. Finally, the Board requested other ways that County assets could be utilized as homeless revenue generating resources. On October 21, 2016, the CEO requested an additional 30 days to fully respond to the Motion.

Introduction

The CEO collaborated with County Counsel, the Departments of Regional Planning, Public Works, and Internal Services (ISD) to produce an inventory of potential high-value County properties, analyze the merits of these properties, and estimate their potential advertising revenue.

"To Enrich Lives Through Effective And Caring Service"

**Please Conserve Paper – This Document and Copies are Two-Sided
Intra-County Correspondence Sent Electronically Only**

General criteria were developed with respect to potential advertising opportunities, along with more precise criteria for identifying appropriate locations and properties using Geographic Information System (GIS) technology. Additionally, the CEO consulted with ISD and the Department of Public Works regarding the composition of the County's vehicle fleet, and the non-emergency vehicles on which advertisements could be placed.

Beyond County departments, the CEO consulted with the Los Angeles County Metropolitan Transit Authority (Metro), as well as other jurisdictions throughout the United States that have either explored or implemented a similar program. Finally, the CEO consulted with outside media experts to assist in the valuation of advertising revenue to be generated from County assets.

Considerations Related To Advertising On County Assets

The County has considered various means to generate consistent, ongoing revenue for the Homeless Initiative over the past year. The opportunity to generate advertising revenue from County assets was put forth by the Motion as a potential option to address this critical funding need. Yet the various stakeholders who might participate in this effort presented the CEO with a highly divergent view regarding both the merits and the shortcomings of utilizing County assets to produce advertising revenue. Responding to this feedback, the CEO has identified the following arguments that might arise in the context of any program to advertise on County assets:

Arguments in Favor of Advertising on County Assets

- By selling advertising on County assets, the County uses existing resources (real property and vehicles) to produce consistent, ongoing revenue for the Homeless Initiative. In turn, this stream of revenue benefits the region as a whole.
- Advertising on assets has been a proven revenue generator for privately-owned buildings and public transit assets.
- Advertisements could include messaging that a portion of all revenue is being committed directly to the Homeless Initiative, thereby further promoting the County's efforts to develop a sustainable solution to this problem.

Arguments in Opposition to Advertising on County Assets

- Advertisements on County property could cause confusion, leading members of the public to believe that the County is endorsing particular goods or services.
- Opponents could claim that the advertisements take away from the County image or brand and are too commercialized.
- Advertisements could lead to more visual clutter on busy thoroughfares.
- Public opinion on the new program, if implemented, will vary widely.
- Residents and businesses in the sight line of newly erected advertisements may represent a vocal opposition.

- Incorporated cities may object if the County does not comply with local zoning and permitting regulations.

The possibility of opposing viewpoints will require the County to develop a clearly defined policy to clarify the County's intentions and provide specific guidance regarding the size, messaging, and acceptable types of advertising that would be permissible. The policy would need to include enforceable guidelines that could be monitored for compliance on a regular basis by County staff across multiple departments.

Inventory of County Assets

Buildings

Primarily, we have identified 33 properties (see Attachment A) along major highways and four-lane arterial streets that may be conducive to advertising. In consulting with outside media experts, the CEO learned that individual buildings or sites can generate from \$10,000 to \$80,000 per month in revenue (see Attachments B and C for examples of advertisements on County buildings). The CEO was advised that buildings in West Los Angeles along the 405 freeway can conservatively generate \$60,000 monthly; billboards along other freeways can generate approximately \$45,000 monthly, while those along busy arterial streets can generate approximately \$10,000 monthly. This monthly revenue estimate varies depending on the size of the billboard, and whether the advertisement is in the form of an electronic billboard, standard billboard, or building wrap. The CEO's initial review estimates the combined revenue projection for the 33 properties at approximately \$11 million annually depending on the type of advertising and assuming advertisements are placed throughout the year on all buildings. This revenue estimate would, however, be reduced by any commission paid to a third-party vendor to administer the program. The CEO is not aware of any governmental agency that does not rely on a consultant to manage their advertising program, and initial research indicates that commissions of 50 percent are common. Through a competitive solicitation process, the CEO will attempt to secure a more financially advantageous commission structure for the County.

The CEO has concluded that a professional valuation study would need to be completed to further evaluate the suitability of the 33 properties and their respective revenue-generating potential. The CEO also believes that additional time is merited to research other County-owned properties that might present an advertising opportunity, including those not situated adjacent to four-lane roads and highways. Finally, the CEO will need to further review issues involving landmark buildings, joint tenancy with outside parties, Coastal Zone implications, the applicability of the Outdoor Advertising Act (OAA) to some or all of the properties, and other potential impediments to advertising. At least 10 of the 33 properties identified by the CEO are thought to be subject to these issues.

Vehicles

In a June 29, 2016 report to the Board, ISD stated that there are 10,822 light duty vehicles in the County's fleet of vehicles. Of the 10,822 vehicles, 7,520 are non-emergency vehicles.

Given the type of vehicles maintained in the County's fleet, a total of 3,170 non-emergency vans and trucks may be suitable for advertising (see Attachment D for sample vehicle advertisement). However, unlike public transit vehicles, County vehicles do not have a reliable, designated route and will therefore have limited revenue potential. The CEO consulted with the Cities of Oceanside and Chicago, and Metro in determining the projected media revenue for each County vehicle. These cities advertise primarily on larger vehicles where the advertisements are most visible. It was determined that each County vehicle can potentially generate around \$250 in revenue each month. The CEO estimates no more than \$2.5 million of annual revenue if 50 percent of the 3,170 eligible vehicles are utilized for advertising, and a reasonable commission is paid to a third-party administrator.

Proposed Guidelines

One of the challenges associated with this initiative is to create a framework that balances the goal of revenue generation with the need to limit the advertising to what would be appropriate for County facilities and vehicles. As directed by the Board, Attachment E provides a draft set of guidelines for the Board to consider in this regard.

Implementation Process

Should the Board approve a countywide assets advertising program, the CEO would develop a Request for Proposal (RFP) for a third party vendor to manage the program and contract with advertisers. This RFP process would, however, need to be preceded by a professional valuation study as stated herein. This would allow for a more comprehensive review of County assets and their revenue-generating potential, which could take up to three months to complete. The valuation study would dictate the assets available for advertising through an RFP process. Concurrent to this review, the County would conduct a California Environmental Quality Act (CEQA) analysis, and dependent upon the outcome of the CEQA analysis, an Environmental Impact Report (EIR) may be needed for any significant environmental effects of proposed advertising structure construction.

The actual RFP process may then require an additional six to nine months to solicit a qualified program administrator and make a contract award recommendation to the Board. It is expected that the RFP will allow vendors to submit proposals based on a variety of compensation models, including contingency fee, fixed price, revenue-sharing, or some combination thereof. The CEO intends to select the model that provides the greatest revenue for the County.

Once a program administrator has been selected, the County would then work to refine the appropriate procedures for selecting individual advertisements and placing them on

County assets. The annual budget for such a program would likely be minimal as the third-party vendor would almost certainly work on some form of commission basis. The greatest cost to the County would be in terms of staff time required to review the advertising content for compliance with program guidelines. It is anticipated that such costs would be less than \$250,000 annually and would include any necessary consultations with County Counsel on legal matters.

Permitting Process

Unincorporated Areas

Outside of the Coastal Zone, Section 2.132.140 of the County Code, which regulates the use and location of advertising displays on County-owned or operated property, expressly supersedes Title 22 (Planning and Zoning) of the County Code with regard to the proposed advertising program. Therefore, such advertising displays would not be subject to County zoning regulations and do not need to be reviewed and approved by the Department of Regional Planning, provided they comply with the relevant development standards provided in Section 2.132.140 of the County Code.

Within the Coastal Zone, advertising displays on County-owned properties would additionally need to comply with the relevant Local Coastal Program and Local Implementation Program adopted by the Board of Supervisors. As a result, they would need to be reviewed and approved by the Department of Regional Planning.

Cities

Advertising displays on County-owned properties within incorporated cities would generally be exempt from the relevant city's zoning regulations, due to the County's sovereign immunity, unless waived by the County. The zoning criteria within these incorporated cities vary widely. Some cities may allow advertising displays as a "by right" use (with ministerial site plan review and no public hearing) in all zones or within certain zones, whereas others may allow advertising displays as a discretionary use (with a public hearing) in all zones or within certain zones, and then certain cities may prohibit advertising displays altogether. Finally, it is possible that some cities may employ a mix of approaches; for example, a city could allow advertising displays as a "by right" use in some zones and as a discretionary use in other zones.

Should the County rely on its sovereign immunity, the County would still need to comply with Section 2.132.140 of the County Code (unless within the Coastal Zone, where the County would need to comply with the relevant Local Coastal Program and Local Implementation Program, as noted above). The disadvantage to this approach is that cities may object to the County circumventing their established zoning requirements. Based on information provided by the Department of Regional Planning, the CEO recommends that it may be in the County's best interest to discuss sovereign immunity situations on a case-by-case basis with individual cities.

Caltrans

Certain outdoor advertisements require a permit from the California Department of Transportation (Caltrans). The Caltrans permit requirements apply to advertising displays located in any area subject to the OAA and visible from the affected highway. Permits are issued in five-year durations, during which time advertising copy can be changed as frequently as desired. The County will need to work with Caltrans to meet the permitting requirements for advertising at applicable County properties.

Further Revenue Generation Options

The CEO explored various ways that County assets could be utilized as homeless revenue generating resources, and has summarized the most relevant options below:

Naming Rights

The County may consider establishing a naming rights program in order to generate revenue for combatting homelessness. Many jurisdictions have corporate sponsorship policies or criteria to ensure that the corporate sponsor is aligned with the use and purpose of the property. Additionally, the County could sell names to certain components of County facilities, such as the Hollywood Bowl, Disney Concert Hall, Ford Theater, a County hospital, or other property that might warrant such sponsorships.

Pouring Rights and Snack Agreements

The County could consider entering into an exclusive pouring rights or snack agreement with a vendor to be the exclusive beverage or snack provider for the County. This has been done successfully in cities such as Miami and Chicago.

Advertisements in County Parks and Golf Courses

The County could choose to sell advertisements in County parks and on County golf courses. These are high traffic areas frequented by the public. The County would have strict guidelines as to where and what type of ad could be placed. Examples from other jurisdictions include advertisements on the back of park benches and on golf carts.

Fundraising Efforts

The County could generate revenue for the homeless by coordinating walks, runs and bike rides to simultaneously promote health and wellness, and generate revenue. The County could also sponsor one or more benefit concerts at a County property, with proceeds going towards the Homeless Initiative.

Conclusion

The CEO has concluded that advertising on County assets has the potential to deliver a meaningful revenue stream in support of the Homeless Initiative. Before initiating an RFP process for a program administrator, however, the CEO recommends hiring a consultant to refine the current revenue forecast and provide a more accurate portrayal of future cash flows. Concurrent with this analysis, the CEO will review in greater detail issues involving landmark properties, joint tenancy, sovereign immunity, and Coastal Zone requirements to better understand the limitations associated with various County properties.

If you have any questions, please contact Doug Baron at 213-974-8355, or dbaron@ceo.lacounty.gov.

SAH:JJ:DPH:DSB
CMT:acn

Attachments

c: Executive Office, Board of Supervisors
 County Counsel
 Internal Services
 Public Works
 Regional Planning

ATTACHMENT A

LIST OF MOST VIABLE COUNTY BUILDINGS

Supervisory District	Facility / Address	Comments
Opportunities in County Unincorporated Areas		
2	Chester Washington Golf Course 1930 W. 120 th Street, Los Angeles	Adjacent to major thoroughfares. Requires billboard construction subject to approval.
2	Airport Courthouse 11701 S. La Cienega Boulevard, Los Angeles	Multi-story courthouse at 405 and 105 Freeways.
2	Department of Public Social Services 1740 E. Gage Avenue, Los Angeles	Adjacent to 110 freeway.
2	Public Library 1900 Firestone Boulevard, Los Angeles	Several existing billboards on this street; across from school.
2	Sheriff Station 1326 W. Imperial Highway, Los Angeles	Located at 105 and 110 freeway interchange.
2	Alondra Golf Course 16400 Prairie Avenue, Lawndale	Next to 405 freeway, Redondo Beach and Manhattan Beach Boulevards. Requires billboard construction subject to approval.
5	Wayside Honor Rancho 29310 The Old Road, Castaic	Jail grounds next to 5 freeway.
5	Vacant Property Weldon Canyon Road, Newhall	Adjacent to the 5 freeway, northwest of 14 and 5 interchange. Billboard construction subject to approval.
Opportunities in Incorporated Cities		
1	Department of Public Social Services 2615 S. Grand Avenue, Los Angeles	Large parcel adjacent to 110 freeway.
1	Department of Health Services 313 N. Figueroa, Los Angeles	Multi-story, one building removed from both 110 and 101 freeways.
1	Hall of Administration 500 W. Temple Street, Los Angeles	Central downtown location at Temple Street and Grand Avenue.
1	Hall of Records 320 W. Temple Street, Los Angeles	Multi-story building in central downtown thoroughfare.
1	Hall of Justice Parking Structure 211 W. Temple Street, Los Angeles	Multi-story parking structure next to 101 freeway.
1	LAC+USC New Hospital 2051 Marengo Street, Los Angeles	Large multi-story building along the 10 and 5 freeways.
1	LAC+USC Old Hospital 1008 State Street, Los Angeles	Buildings along the 10 and 5 freeways.
1	LAC+USC Parking Structure 1009 Kingston Avenue, Los Angeles	Multi-story parking visible from 10 and 5 freeways.

1	El Monte Airport Building 4233 Santa Anita Avenue, El Monte	On building; adjacent to major thoroughfare Santa Anita Avenue.
1	Bob Hope Patriotic Hall 1816 S. Figueroa Street, Los Angeles	Multi-story building visible from 10 freeway.
2	Department of Mental Health 550 S. Vermont Avenue, Los Angeles	Multi-story high rise in commercial area
3	Agoura Animal Care Center 29525 Agoura Road, Agoura Hills	Adjacent to 101 freeway; requires billboard construction
3	Parking Structure 8752 El Tovar Place, West Hollywood	Multi-story parking structure/library off of San Vicente with heavy traffic
3	West Hollywood Sheriff Station 720 N. San Vicente Boulevard, West Hollywood	Adjacent to Pacific Design Center
3	Vacant Property 19444 Pacific Coast Highway, Malibu	Adjacent to Pacific Coast Highway; in coastal zone. Billboard construction subject to approval.
3	Vacant Property 28722 Pacific Coast Highway, Malibu	Adjacent to Pacific Coast Highway; billboard construction required; in coastal zone. Billboard construction subject to approval.
3	John Anson Ford Theatre 2580 Cahuenga Boulevard, Los Angeles	Visible to those attending the venue; property, not theater, visible from 101
3	Hollywood Bowl 2301 N. Highland Avenue, Los Angeles	Visible to those attending venue, heavy use in summer months
3	Vacant Property 811 Esplanade, Redondo Beach	Along major thoroughfare; requires billboard construction subject to approval; in coastal zone
3	Department of Mental Health Office 11080 W. Olympic Boulevard, Los Angeles	At corner of Olympic and Sepulveda.
4	Probation and ISD Offices 9230 Imperial Highway, Downey	Large property along major thoroughfare
4	Lakewood Golf Course 3101 E. Carson Street, Lakewood	Carson Street bisects golf course, west of Lakewood Boulevard
4	Vacant Property 12819 Norwalk Boulevard, Norwalk	Adjacent to 5 freeway and major thoroughfare; requires billboard construction subject to approval.
4	Diamond Bar Golf Course 22751 E. Golden Springs Drive, Diamond Bar	Long stretch adjacent to 60 freeway. Requires billboard construction subject to approval.
5	Whittier Narrows Recreation Area 750 S. Santa Anita Avenue, Arcadia	Adjacent to 60 freeway.

ATTACHMENT B

SAMPLE BUILDING ADVERTISING AT BOB HOPE PATRIOTIC HALL



Photo Credit: Layrd Consulting, Inc.

ATTACHMENT C

SAMPLE BUILDING ADVERTISING AT DEPARTMENT OF MENTAL HEALTH OFFICE



Photo Credit: Layrd Consulting, Inc.

ATTACHMENT D

SAMPLE VEHICLE ADVERTISEMENT FROM THE CITY OF OCEANSIDE



Photo Credit: City of Oceanside, California

ATTACHMENT E

DRAFT

COUNTYWIDE ADVERTISING GUIDELINES

LOS ANGELES COUNTY REAL AND PERSONAL PROPERTY ADVERTISING GUIDELINES

1.0 POLICY STATEMENT

The County of Los Angeles ("County") has determined that allowing advertising on its real and personal property (collectively, "County Property") will provide: (1) an important additional source of revenue for critical programs and services for the residents of the County, including but not limited to services for homeless individuals; and (2) a medium to communicate with constituents who visit County buildings and facilities, or who come into contact with other County property, such as fleet vehicles.

This County therefore adopts these advertising guidelines ("Guidelines") to:

- Declare its intention to create a limited public forum on County Property for private commercial advertising pre-approved by the County and County-generated informational advertising only;
- Identify County Property available for private commercial advertising and County-generated informational advertising ("County Advertising");
- Establish eligibility criteria for private commercial advertising proposed to be displayed on County Property; and
- Establish and fix parameters applicable to the display of private commercial and County Advertising on County Property.

2.0 EFFECTIVE DATE OF GUIDELINES

These Guidelines are effective as of the date these Guidelines are adopted by the Board of Supervisors, as may be amended from time to time, and shall remain effective until it is repealed in its entirety by the Board of Supervisors.

3.0 APPLICATION OF GUIDELINES

All advertising on County Property must conform to the procedures and provisions of these Guidelines. All County employees and any vendors contracted to implement these Guidelines must enforce the procedures and provisions of these Guidelines consistently and without exception.

4.0 COUNTY PROPERTY AVAILABLE FOR ADVERTISING

The County Chief Executive Officer ("CEO"), in conjunction with any County department maintaining real or personal property potentially available for advertising, shall

prepare and maintain an inventory ("Inventory") of advertising space available on County real and personal property. The intent of the Inventory shall be to maximize advertising revenue to the County while minimally interfering with the operation of County facilities and property, and without jeopardizing the health, safety, and welfare of individuals coming into contact with the advertising.

The CEO may, without further approval by the Board of Supervisors, contract with a vendor or consultant to identify appropriate advertising space in and on County real and personal property, provided sufficient funds have been budgeted and the contract is approved as to form by County Counsel.

The CEO shall revise the Inventory periodically, but not less than every five (5) years.

For the purposes of these Guidelines, any reference to "County Property" refers to the real and personal property identified in the Inventory, as it may be revised from time to time.

5.0 LIMITED PUBLIC FORUM STATUS

The County's acceptance of private commercial advertising on County Property, and the County's use of County Property to display County Advertising, is not intended to and does not create a general or traditional public forum for expressive activities. The County does not intend to open, and is not opening, advertising space on County Property for public discourse and debate.

Rather, the County's fundamental purpose and intent is to accept private commercial advertising as a means of generating revenue to support County programs and services, and to create a medium for the County to disseminate informational advertising to its constituents through County Advertising.

With respect to private commercial advertising, these Guidelines advance the County's purpose and intent by prohibiting advertisements that could detract from the County's revenue-generating goals, including but not limited to advertisements which create substantial controversy, interfere with and divert resources from County operations, or pose significant risks of harm, inconvenience, or annoyance to people who view the advertisements, or who are in the vicinity of the advertisements. These Guidelines further limit commercial advertisements by prohibiting advertisements which indirectly contribute to reduced County revenues or contravene County policy, such as advertisements that promote smoking or the consumption of alcohol.

At the same time, the parameters established in these Guidelines for private commercial advertising are intended to be viewpoint neutral. No County employee or any vendor shall reject or prohibit an otherwise eligible advertisement based solely on the viewpoint it advocates.

6.0 DISCLAIMER OF ENDORSEMENT

The County's acceptance of an advertisement does not constitute express or implied endorsement of the content or message of the advertisement, including any person, organization, products, services, information, or viewpoints contained therein, or of the advertisement sponsor itself. This endorsement disclaimer extends to and includes content that may be found via internet addresses, quick response (QR) codes, and telephone numbers that may appear in posted advertisements and that direct viewers to external sources of information.

7.0 ADVERTISING VENDOR

These Guidelines and the program of advertising authorized herein may be implemented under contract with an outside vendor. The vendor shall be selected consistent with applicable solicitation requirements, and the resulting contract must:

- Conform to these Guidelines;
- Maximize revenue to the County;
- Be consistent with advertising industry policy and practice;
- Reserve for the County not less than five percent of County Property for County Advertising, or provide other provisions to ensure that County Advertising is not preempted or precluded by private revenue-generating advertising; and
- Be approved by the Board of Supervisors.

All vendor contracts shall be administered by the CEO, or the CEO's designee, who shall exercise decision-making authority over the contract, including but not limited to any decision to pre-review or reject an advertisement submitted for display on County Property, or to remove an advertisement posted on County Property.

The County may delegate to a vendor the right to review advertising content according to the vendor's own of acceptability, provided such guidelines are approved in advance by the County and are not less restrictive than these Guidelines. The County may further delegate to a vendor the ability to post advertisements which are consistent with these Guidelines without prior review by the County. Nevertheless, the County shall reserve in any vendor contract the following rights:

- The right to pre-review any or all advertising content submitted for display on County property;
- The right to reject any advertising content submitted for display on County Property; and

- The right to order the removal of any advertising posted on County Property.

8.0 ADVERTISING RESTRICTIONS

8.1 Alcohol and Tobacco Advertising

Pursuant to County Code section 2.132.130.C, advertising of all alcohol and tobacco products is prohibited. All products that simulate and/or encourage the act of smoking, including but not limited to tobacco-less products such as electronic cigarettes and related accessories, are also prohibited.

8.2 Non-Commercial Advertising

Except as expressly provided in the paragraph immediately following below, all non-commercial advertising is prohibited. Specifically, acceptable advertising must promote for sale, lease, or other form of financial benefit, a product, service, event or other property interest in primarily a commercial manner for primarily a commercial purpose.

Notwithstanding the foregoing, these Guidelines allow the County to display County Advertising consisting of non-commercial, informational advertising generated by the County for dissemination to its constituents.

8.3 Other Content-Based Restrictions

Advertising may not be displayed on County Property if its content involves:

- Illegal Activity – Promotes or relates to an illegal activity.
- False or Misleading Information or Messaging – Contains material that is false, fraudulent, misleading, or deceptive, or would constitute a tort of defamation or invasion of privacy.
- Violence – Contains images, copy or concepts that promote guns/firearms or gun violence, or that depict weapons or other devices in an act of violence on or harm to a person or animal, or contain any material that incites or encourages, or appears to incite or encourage, violence or violent behavior.
- Demeaning or Disparaging Content – Contains images, copy or concepts that actively denigrate, demean or disparage any individual or group.
- Vulgarity – Contains images, copy or concepts that are vulgar, profane, or scatological.
- Copyright or Trademark Violations, or Is Otherwise Unlawful – Contains material that is an infringement of copyright, trademark or service mark, or is otherwise unlawful or illegal.

DRAFT

- Obscene Matter – Contains obscene matter as defined in County Code section 13.17.010, sexually explicit material as defined in County Code section 8.28.01.
- Adult Entertainment – Promotes or displays images associated with adult book stores, video stores, dance clubs or other adult entertainment or sexually-oriented establishments, telephone services, internet sites, films, video games or escort services.
- Adult or Mature-Rated Films, Television or Video Games – Promotes adult films rated "X" or "NC-17," television rated "MA," or video games rated "A" or "M."
- Political Messages – Contains messages that are political in nature, including messages of political advocacy, that support or oppose any candidate or referendum, or that feature any current political office holder or candidate for public office, or take positions on issues of public debate.
- Religion – Contains images, content or copy related to religion or religious ideas or viewpoints, including but not limited to the existence or non-existence of a deity.
- Negative Connotations of County Facilities or Employees – Contains images, copy or concepts that actively denigrate County facilities or employees.
- Injurious to the County's Interests – Promotes products, services or other concepts that are adverse to the County's commercial or administrative interests.
- County's Endorsement – Contains images, copy or concepts that inaccurately state or imply the County's endorsement of the subject of the advertisement.
- Harmful or Disruptive to County Property or Facilities – Contains material that is so objectionable as to be reasonably foreseeable that it will result in harm to, disruption of, or interference with County property or facilities.
- Lights, Noise, and Special Effects – Contains flashing lights, sound makers, mirrors or other special effects that interfere with the health, safety, or welfare of a County facility or the public at large.
- Inappropriate Advertising – Advertising which is not inherently misleading or deceptive but which, because of the location and expected viewers of the advertisement, is reasonably likely to become misleading or deceptive. In implementing this exclusion, special attention and care shall be given to advertising which is placed on or near schools, hospitals, and other facilities

in which the persons using or housed in such facilities are more likely than the average person to be misled or deceived by advertising.

9.0 ADDITIONAL REQUIREMENTS

9.1 Sponsor Attribution and Contact Information

Any advertising in which the identity of the sponsor is not readily and unambiguously identifiable must include the following phrase to identify the sponsor in clearly visible letters (no smaller than 72-point type for exterior advertising and 24-point type for interior advertising):

Paid for by _____.

"Teaser ads" that do not identify the sponsor will, however, be allowed provided a similar number of follow-up advertisements are posted within eight weeks of the initial teaser ads that do identify the sponsor of those initial ads.

9.2 Mandatory Reference to County Services and Programs

All private, commercial advertisements posted on County Property shall contain the following phrase in clearly visible letters (no smaller than 72-point type for exterior advertising and 24-point type for interior advertising):

This advertisement supports important programs and services of the County of Los Angeles, including services and programs to reduce and end homelessness.

10.0 COUNTY ADVERTISING

10.1 Types of Advertising Authorized

The County may cause to be displayed on County Property any advertising of an informational nature which advances a County purpose. Examples of permissible advertisements include, by way of example only and without exclusion:

- Advertisements informing constituents of the availability of County services and programs;
- Advertisements alerting constituents of County-sponsored events and performances;
- Advertisements promoting County policies, including but not limited to personal and occupational health, campaigns seeking to end domestic violence and discrimination, and the use of public transportation, parks, libraries and beaches; and
- Public service announcements.

DRAFT

County Advertising must clearly identify itself as sponsored or endorsed by the County, or by an agency for which the County Board of Supervisors acts as the governing body.

10.2 Procedure for Placing County Advertising

The CEO, or the CEO's designee, shall be responsible for reviewing and placing, or directing a vendor to place, County Advertising on County Property. County departments or agencies shall work with the CEO, or the CEO's designee, to create advertising consistent with these Guidelines. The CEO, or the CEO's designee, shall have final decision-making authority over the form, content, copy, and other aspects of proposed County Advertising.

11.0 PROCEDURAL HISTORY

[DATE] Guidelines adopted by the Board of Supervisors